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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of PACIFIC GAS AND  
ELECTRIC COMPANY, a California  
corporation, for a Permit to Construct the  
Fulton-Fitch Mountain Reconductoring Project.

(U 39 E)

A.15-12-005  
(Filed December 3, 2015)

**PACIFIC GAS AND ELECTRIC COMPANY'S  
SECOND PETITION FOR MODIFICATION  
OF DECISION 17-12-012**

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Dated: October 31, 2018

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**I. INTRODUCTION**

In accordance with Rules 16.4 of the California Public Utilities Commission’s (“CPUC’s” or “Commission’s”) Rules of Practice and Procedure, Pacific Gas and Electric Company (“PG&E”) hereby submits this Second Petition for Modification of Decision 17-12-012, issued December 18, 2017, to use an 845-foot existing road as an alternate access route to a staging area and landing zone critical for construction of the approved project.

PG&E does not contest approval of the permit to construct for this project or any finding of fact or conclusion of law. Rather, PG&E seeks permission to re-route a short access road to minimize impacts on local homeowners.

**II. PROCEDURAL HISTORY**

On December 14, 2017, the Commission approved Decision 17-12-012, which granted PG&E’s request for a permit to construct (“PTC”) the Fulton-Fitch Mountain Reconductoring Project (“Project”). The PTC approved PG&E’s plan to reinforce the electric transmission system in central Sonoma County by replacing conductors on a 9.9-mile-long section of the Fulton-Hopland 60-kV Power Line (“Fulton-Hopland 60 kV line”) between Fulton Substation

and Fitch Mountain Substation, replacing poles along 8 miles of the Fulton-Hopland line, and replacing conductor on 1.4 miles of the Geysers #12 Fulton 230-kV Transmission Line (“Geysers #12 230 kV line”). The proposed project would be located primarily in unincorporated Sonoma County and a small portion of the Town of Windsor, between Larkfield-Wikiup and the Russian River.

An Application for Rehearing filed by PG&E on January 17, 2018, to remove dictum about pole wind loading, was granted on April 27, 2018. PG&E file its first petition for modification on June 29, 2018 to replace poles on an additional 1.4 miles of the project. That petition is currently pending.

### **III. LEGAL STANDARD**

Commission Rule 16.4(b) provides:

A petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision. Any factual allegations must be supported with specific citations to the record in the proceeding or to matters that may be officially noticed. Allegations of new or changed facts must be supported by an appropriate declaration or affidavit.

Under Rule 16.4(d), a petition must be filed and served within one year of the original decision, absent other justification. This Second Petition complies with Rule 16.4(d), as it has been filed within a year of the December 14, 2017 approval.

### **IV. PETITION FOR MODIFICATION**

#### **A. Justification for Requested Relief**

Decision 17-12-012 provides that, if a minor project refinement would occur outside the geographic area evaluated in the Mitigated Negative Declaration (“MND”), PG&E must submit a petition for modification. (D.17.12.012, at 7-8, 15.) Because the 845-foot existing access road

that PG&E proposes to use is adjacent to but not within the area evaluated in the MND, PG&E is hereby submitting this petition.

In its PTC application, PG&E proposed to locate a staging area and landing zone on property north of the community of Larkfield-Wikiup in unincorporated Sonoma County. Access was proposed along an existing gravel road extending from Shiloh Ridge Road, a private, paved road with access to the Mayacama Golf Course and residences within two homeowners' associations. PG&E has existing access easements for utility maintenance over these roadways. The Shiloh Home Owners Associations ("SHOA") has objected to PG&E's use of the Shiloh Ridge Road for this project and has urged PG&E to use a nearby alternate access, an existing gravel road that extends from Faught Road, a public road. The SHOA has expressed concerns with traffic impacts, dirt/mud tracking and truck damage to the paved road surface due to use of the approved project access road. The proposed access road will address the homeowners' association's concerns by curtailing the need for project vehicles to travel on Shiloh Ridge Road. This proposed access is critical to allow for staging and work activities for the project.

PG&E has submitted biological and cultural survey reports for the access road and the attached Second Supplemental PEA ("Second Supp. PEA") indicating there will be no new significant impacts resulting from this minor change. As required by Rule 16.4, these changed facts are set out in the Declaration of David L. Thomas, attached hereto as Exhibit B.

## **B. Changes Requested**

PG&E requests no changes to Decision 17-12-012 or to the approved Mitigation, Monitoring and Reporting Program. Rather, PG&E requests that the adopted IS/MND incorporate Figure 2.1-1 showing the additional access road, based on an Addendum prepared by CPUC staff. (See part C below.) In accordance with Rule 16.4(b), PG&E has

proposed “specific wording to carry out all requested modifications to the decision” in Exhibit A, attached. No findings of fact or conclusions of law are proposed to be modified.

### **C. California Environmental Quality Act Compliance**

As indicated in the Second Supp. PEA attached as Exhibit C, the revised project will not result in new significant impacts or substantially increase the severity of previously identified impacts. No new information of substantial importance has been identified, and none of the conditions described in Code of California Regulations, Title 14, §§15000, et seq. (“CEQA Guidelines”) Sections 15162 and 15163 that call for preparation of a subsequent negative declaration are present. No new mitigation measures are necessary to reduce impacts. For these reasons, PG&E requests adoption of an Addendum to support the project changes under Section 15164.

### **D. Request for Timely Action**

PG&E urges expedited processing of this minor request to minimize further disturbance to the residents of the Shiloh Home Owners’ Association. If blocked from continued access along the original route without an alternative available by December 1, 2018, PG&E’s construction will likely be delayed for one year.

## V. CONCLUSION

As discussed above, PG&E seeks to modify Decision 17-12-012 in order to use a different access road for construction that will eliminate impacts to the approved access road used by residents from two homeowners' associations.

Respectfully submitted,

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By: /s/Jo Lynn Lambert  
JO LYNN LAMBERT

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

Dated: October 31, 2018

## **EXHIBIT A**

## **EXHIBIT A**

**ADD to adopted IS/MND:**

**Figure 2.1-1 from the Supplemental PEA showing additional access route**



## **EXHIBIT B**

## **Exhibit B**

### **BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

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#### **DECLARATION OF DAVID L. THOMAS IN SUPPORT OF PACIFIC GAS AND ELECTRIC COMPANY'S SECOND PETITION FOR MODIFICATION OF DECISION 17-12-012**

1. I, David L. Thomas, make this declaration in support of Pacific Gas and Electric Company's (PG&E's) Second Petition for Modification of Decision 17-12-012. The statements in this declaration are true and correct to the best of my knowledge.

2. I am a senior planner in PG&E's Environmental Management – Electric Transmission group, with an office at 245 Market Street, San Francisco, CA 94105. I am a certified American Institute of Certified Planners (AICP) Professional with 20 years of utility experience. For the past approximately 2 years I have taken the role as the lead planner for PG&E's Fulton-Fitch Mountain Reconductoring Project.

3. I have directed and assisted my project team in preparing the Supplemental Proponent's Environmental Assessment ("Supp. PEA") to support the Second Petition for Modification of Decision 17-12-012 ("PFM2") for this project. I am familiar with the details of both the approved project and the modifications proposed in the PFM2, and I have been in contact with the Shiloh Home Owners' Association regarding homeowners' concerns about PG&E's use of the Shiloh Ridge Road to access the staging area and landing zone identified as

Staging Area Landing Zone 3. To the best of my knowledge, the facts set forth in the Supp. PEA and the PFM2 accurately reflect the facts as well as the survey and design information currently available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 30, 2018, at San Francisco, California.

/s/ David L. Thomas  
David L. Thomas

## **EXHIBIT C**

# **Second Supplemental Proponent's Environmental Assessment**

## **Fulton-Fitch Mountain Reconductoring Project**

**Prepared for**  
**Pacific Gas and Electric Company**  
**October 2018**

**Prepared by**



1920 Old Middlefield Way  
Mountain View, CA 94043



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## 1.0 INTRODUCTION

On December 18, 2017, the California Public Utilities Commission (CPUC) issued Decision 17-12-012 granting Pacific Gas & Electric (PG&E) a Permit to Construct (PTC) the Fulton-Fitch Mountain Reconductoring Project and adopting the Final Initial Study/Mitigated Negative Declaration (2017 Final MND) in compliance with the California Environmental Quality Act (CEQA). D.17-12-012 provides that any project refinements, no matter how minor, must be approved in a petition for modification (PFM) if they occur outside of the project study area. (D.17-12-012, at 7-8.) To reduce unanticipated impacts to area residents, including those in the Shiloh Home Owners' Association (SHOA), PG&E is requesting approval to use an existing roadway adjacent to the project study area to access Staging Area Landing Zone-3 (LZ-3). PG&E is submitting this Second Supplemental Proponent's Environmental Assessment (Second Supplemental PEA or Second Supp. PEA) in support of the PFM to confirm that no new or additional significant impacts would result from use of this 845-foot roadway adjacent to the project study area.

### 1.1 REVISIONS TO THE APPROVED PROJECT

In its PTC application, PG&E proposed to locate a staging area and landing zone on property north of the community of Larkfield-Wikiup in unincorporated Sonoma County. Access was proposed along an existing gravel road extending from Shiloh Ridge Road, a private, paved road with access to the Mayacama Golf Course and residences within two homeowners' associations. PG&E has existing access easements for utility maintenance over these roadways. The SHOA has objected to PG&E's use of the Shiloh Ridge Road for this project and has urged PG&E to use an alternate access. Unfortunately, although impacts on the homeowners could be eliminated by utilizing the alternate route, the alternative is not within the original project study area and PG&E must apply for a PFM to use the new route.

PG&E proposes to utilize an existing, approximately 0.16-mile (845-foot) access road to Staging Area LZ-3, totaling approximately 0.29 acres. Landowner permission to use the alternative route has already been obtained. The proposed access route extends off Faught Road, just north of Shiloh Ridge Road, and along an agricultural field into the western side of Staging Area LZ-3. The proposed access route would be used to facilitate approved staging area activities.

### 1.2 ORGANIZATION OF THE SUPPLEMENTAL PEA

Details of the proposed project modifications and related revisions in the construction plan are described below in Chapter 2, "Description of Project Modifications." An analysis of these modifications is contained in Chapter 3, "Environmental Analysis." The analysis of project modifications in Chapter 3 demonstrates that only minor changes to the 2017 Final MND are necessary to reflect the proposed modifications to the project, and none of the conditions described in Section 15162(a) of the CEQA Guidelines calling for preparation of a subsequent negative declaration would occur. Thus, an addendum to the 2017 Final MND is the appropriate mechanism to address these modifications to the project.

## **2.0 DESCRIPTION OF PROJECT MODIFICATIONS**

### **2.1 LOCATION AND OVERVIEW OF PROJECT MODIFICATIONS**

PG&E proposes to use a different route along an existing access road to reach Staging Area LZ-3. As shown on Figure 2.2-1, Proposed Access Route, the proposed 0.16-mile access route would extend from Faught Road, just north of Shiloh Ridge Road, to the western portion of Staging Area LZ-3. The new access route, approximately 845 feet long and totaling approximately 0.29 acres, would facilitate approved staging area activities, including helicopter landing, storing construction materials and equipment, refueling equipment and helicopters, parking vehicles and equipment, collecting construction waste prior to disposal, and conducting construction workforce meetings.

As shown on Figure 2.2-1, the approved project access to Staging Area LZ-3 utilizes an existing gravel road off Shiloh Ridge Road. Shiloh Ridge Road is a private paved road and provides the only access to the Mayacama Golf Course and residences belonging to two homeowners' associations. The Shiloh Home Owners Association (SHOA) has expressed concerns with traffic impacts, dirt/mud tracking and truck damage to the paved road surface concerning use of the approved project access road. The proposed access road will address the homeowners' association concerns by curtailing the need for project vehicles to travel on Shiloh Ridge Road. The proposed access is critical to enable staging and work activities for construction of the project.

Existing land uses along the proposed access route include a vineyard and private, open space. Surrounding land uses include pasture as well as additional vineyards and private, open space. Two residences are located along Faught Road, a public road, within 500 feet of the proposed access route. The proposed access road crosses two culverted water features.

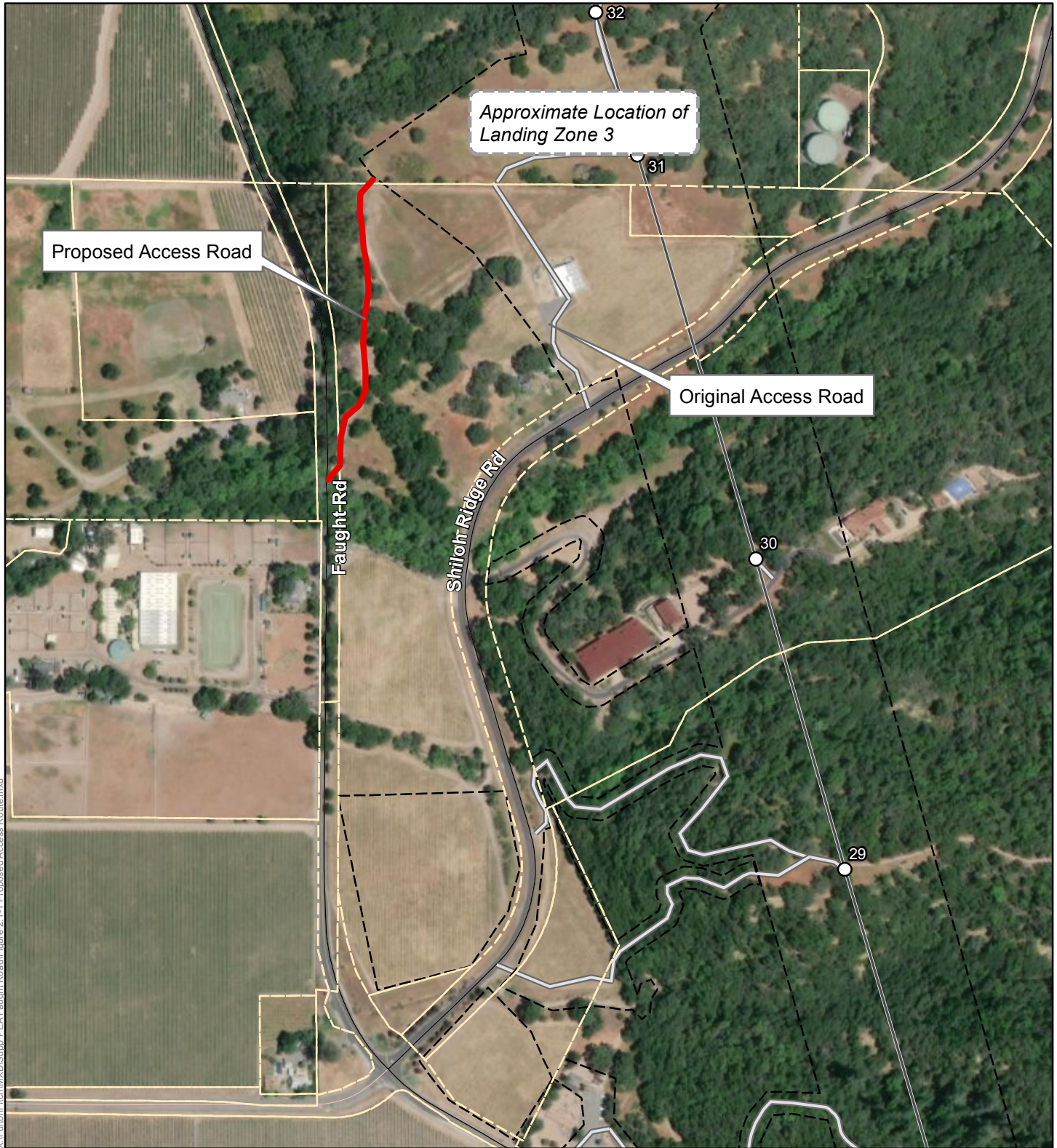
### **2.2 PROJECT COMPONENTS**

No changes are proposed to project components.

### **2.3 CONSTRUCTION**

#### **2.3.1 OVERVIEW**

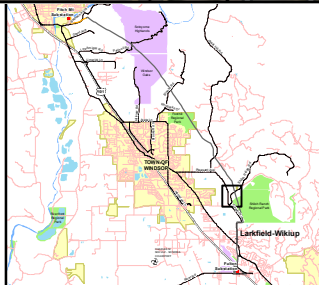
This PFM proposes a different existing access road to reach Staging Area LZ-3. No changes are proposed to aerial access, pole work areas, pull sites, or mid-span work locations.



X:\FultonFitch\MXD\Supp PEA\Faught Rd\Faught Rd\Figure 2.1-1 Proposed Access Route.mxd

# **Legend**

- Proposed Access Road
- Project Study Area
- Project Pole
- Transmission Line
- Original Access Road
- Parcel Boundary



**Figure 2.1-1**  
Proposed Access Route  
*Fulton-Fitch Mountain Reconductoring Project*

1:4,800  
0 100 200 Feet



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## **2.3.2 WORK AREAS AND ACCESS**

### **2.3.2.1 PG&E Easements and Access Rights**

PG&E has existing access rights and has been in contact with the parcel owner.

### **2.3.2.2 Ground Access**

The proposed project modification consists of approximately 0.16 miles (845 feet) of existing gravel access road contiguous with but outside the boundary of the Final IS/MND Project Study Area. As with the approved project, preparation of the proposed route will require vegetation clearing within 8 feet of the road centerline and up to 14 feet in height; gravel will be placed in the road bed. A new gate will be installed.

### **2.3.2.3 Vegetation Clearance**

Vegetation clearance would occur within the approximate 0.29-acre area. Approximately three oak trees with branches that overhang the access road would be trimmed to accommodate project vehicles and equipment. The amount of vegetation clearing and tree trimming will remain within the range described in Table 2.6-6 of the Final MND.

### **2.3.2.4 Ground Disturbance**

Ground disturbance for the approved project is described on pages 2-30 and 2-31 of the 2017 Final MND. Use of the proposed access road will replace use of an approved access road that is similar in length and width. Some gravel will be added, but no additional ground disturbance is anticipated. The amount of ground disturbance will remain within the range described in Table 2.6-6 of the Final MND.

## **2.3.3 SITE DEVELOPMENT**

Site development will proceed as described in Section 2.6.3 of the Final MND.

## **2.3.4 POLE REMOVAL, REPLACEMENT, AND INSTALLATION**

No changes are proposed to pole removal, replacement, and installation.

## **2.3.5 RECONDUCTORING**

No changes are proposed to reconductoring.

## **2.3.6 TRAFFIC CONTROL**

Traffic control for the approved project is described in Section 2.6.8 of the Final MND. Traffic Control Measures for the proposed access road would be the same as for the approved project.

## **2.3.7 WATER USE**

No changes are anticipated to water use.

## **2.3.8 WASTE DISPOSAL**

No changes are anticipated to waste disposal.

### **2.3.9 CLEANUP AND RESTORATION**

Cleanup and restoration will proceed as described in Section 2.6.11 of the Final MND.

### **2.3.10 EQUIPMENT AND WORKFORCE**

The approved project workforce and equipment for the Northern Segment are described in the Final MND on page 2-44 and in Table 2.6-7 (pages 2-45 to 2-48). No changes are proposed to the approved equipment and workforce.

### **2.3.11 SCHEDULE AND TIMING**

The approved project schedule for the Northern Segment is described in Section 2.6.13 “Schedule and Timing” in the Final MND. No changes are proposed to the schedule.

## **2.4 OPERATION AND MAINTENANCE**

Operation and maintenance of the approved project is described in Section 2.7 “Operation and Maintenance” of the 2017 Final MND (CPUC 2017, pages 2-51 to 2-52). No changes are proposed to operation and maintenance.

## **2.5 PERMITS AND APPROVALS**

Permits and approvals that may be required for the approved project are described in Section 2.8 “Permits and Approvals” of the 2017 Final MND (CPUC 2017, pages 2-52 to 2-54). No additional permits or approvals are anticipated as a result of the proposed modifications.

## **2.6 ELECTRIC AND MAGNETIC FIELDS (EMF)**

The proposed modification will not result in any changes to EMF.



## 3.0 ENVIRONMENTAL ANALYSIS

### 3.1 AESTHETICS

Section 3.1 of the 2017 Final MND described and analyzed impacts of the approved project on aesthetic resources (CPUC 2017: Final MND pages 3.1-1 to 3.1-36). That discussion is hereby incorporated by reference.

The proposed change in access route will improve aesthetic impacts, as it will eliminate future potential road dirt and traffic on the newly-paved Shiloh Ridge Road. Instead of turning east onto Shiloh Ridge Road, construction traffic will continue approximately one-half mile further on Faught Road and turn east onto an existing, unpaved access road to the staging area. This 845-foot road is on private property, with landowners who have no objection to the access and who have granted PG&E an easement in October 2018. Views of the existing access road are shown in Figures 3.1-1, 3.1-2, and 3.1-3.



**Figure 3.1-1: Photograph of entrance to access road from Faught Road looking east**





**Figure 3.1-2: Photograph along access road looking north towards Staging Area LZ-3**



**Figure 3.1-3: Photograph of access road looking south from Staging Area LZ-3**



Approved work is already occurring in the work area, Staging Area LZ-3, now being accessed from the Shiloh Ridge Road direction. The proposed change in access route would not result in any impacts to aesthetics that have not already been discussed in the 2017 Final MND. No trees will be removed. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

## **3.2 AGRICULTURE AND FORESTRY RESOURCES**

Section 3.2 of the 2017 Final MND described and analyzed impacts of the approved project related to agricultural and forestry resources (CPUC 2017: Final MND pages 3.2-1 to 3.2-12). That discussion is hereby incorporated by reference.

The new access route is along an existing road and would not result in the conversion of farmland to non-agricultural land. The access road would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

## **3.3 AIR QUALITY**

Section 3.3 of the 2017 Final MND described and analyzed impacts of the approved project related to air quality conditions in and around the project site (CPUC 2017: Final MND pages 3.3-1 to 3.3-21). That discussion is hereby incorporated by reference.

Like use of the existing route to Staging Area LZ-3, use of the proposed access route could result in the creation of fugitive dust during construction. APM AIR-1 would ensure that impacts from fugitive dust would be minimized and impacts to air quality would remain less than significant. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

## **3.4 BIOLOGICAL RESOURCES**

### **3.4.1 DEFINITIONS**

This discussion adopts the definitions included in Section 3.4.1 of the 2017 Final MND (CPUC 2017: Final MND pages 3.4-1 to 3.4-2).

### **3.4.2 ENVIRONMENTAL SETTING**

The “Environmental Setting” discussion in Section 3.4.3 of the 2017 Final MND described biological resources in the project area and identified special-status species with potential to be impacted by the approved project (CPUC 2017: Final MND pages 3.4-4 to 3.4-18). That discussion is hereby incorporated by reference. The proposed access route is contiguous with the project study area analyzed in the 2017 Final MND, and the range of special-status species, vegetation types, and habitat types are the same.

A vegetation survey and vegetation mapping of the proposed access route and all areas within 25 feet was conducted on May 2, 2018 (Stantec 2018a). At the time of the survey, the existing unpaved access road appeared used and maintained with gravel in some locations, with non-native grasses along the center of the road. The vegetation/land cover types present adjacent to

the road include 0.05 acres of disturbed land consisting of two burn piles, 0.15 acres of non-native grassland, 0.08 acres of vineyard, and 0.5 acres of coast live oak woodland. The survey report notes that the proposed access route crosses two small, ephemeral watercourses that flow through corrugated metal pipes under the roadway, approximately 2 feet in diameter.

Because trees will need to be trimmed, an assessment of bat-roosting habitat was conducted on May 14-15, 2018 (GANDA 2018). The assessment consisted of visual inspection of three oak trees potentially requiring trimming and determined that potential bat-roosting habitat was present.

### **3.4.3 IMPACT ANALYSIS**

The “Impact Analysis” discussion in Section 3.4.4 of the 2017 Final MND analyzed impacts on biological resources that would occur during construction, operation, and maintenance of the proposed project (CPUC 2017: Final MND pages 3.4-18 to 3.4-45). That discussion is hereby incorporated by reference.

**a) Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS? *Less-than-Significant Impact With Mitigation***

Because the new route is located adjacent to the original project study area, use of the proposed access road has the potential to cause the same direct and indirect impacts to the same special-status species as the existing project as described in the 2017 Final MND. The proposed access route crosses two water features with existing culverts. Approximately 3 trees will be trimmed to allow clearance for construction vehicles and equipment, all of which provide potential bat roosting habitat. PG&E would implement mitigation measure (MM) Biology-6 prior to trimming trees that could provide bat roosting habitat to ensure that any impacts to special-status or otherwise-protected bat roosts will be less than significant. Implementation of applicant-proposed measures (APMs) and mitigation measures APM BIO-1a, APM BIO-1g, APM BIO-1h, APM BIO-1j, APM BIO-1k, APM BIO-7, APM BIO-8, APM BIO-9, MM Biology-1, MM Biology-2, MM Biology-3, MM Biology-4, MM Biology-5, and MM Hydrology-4 would reduce direct impacts to less than significant. Implementation of APM BIO-1f, APM BIO-8, MM Biology-5, MM Biology-6, MM Biology-7, MM Biology-8, APM HM-3, APM HM-4, MM Hazards-1, and MM Hazards-2 would reduce indirect impacts to less than significant. Impacts would remain less than significant with mitigation.

**b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service? *Less-than-Significant Impact With Mitigation***

As was the case with the existing project, trees will be trimmed to provide clearance for construction vehicles and equipment along the proposed access road. No trees are planned to be removed, and approximately 3 trees are identified for trimming. As necessary, PG&E will comply with the project’s Revegetation, Restoration, and Monitoring Plan, approved by the CPUC on June 13, 2018, as described in MM Biology-7 in the 2017 Final MND. That plan would require PG&E to replace any trees or shrubs removed on a 1:1 basis. PG&E would also

implement MM Biology-9, which requires PG&E to avoid sensitive natural plant communities to the greatest extent feasible and mitigate for unavoidable impacts on sensitive vegetation communities at a 1:1 ratio, and MM Biology-1, which describes the biologist's qualifications. As is the case for the existing project, the temporary impact on riparian woodland would remain less than significant with mitigation.

**c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? *Less-than-Significant Impact With Mitigation***

Two seasonal watercourses flow through existing culverts beneath the proposed access road. PG&E would implement MM Hydrology-4, which requires PG&E to specify methods to minimize impacts to seasonal watercourses, and MM Biology-11, which requires additional protection procedures and, if there were any impact, compensatory mitigation at a 2:1 ratio for every acre of impact to jurisdictional waters. No such impacts are expected. As with the existing project, PG&E would implement MM Biology-8 (noxious weeds) and MM Hazards-1 (hazardous materials procedures) to address indirect impacts to jurisdictional waters. Project impacts with use of the proposed access road would remain less than significant with mitigation.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? *Less-than-Significant Impact With Mitigation***

As is the case with the existing project, construction of the proposed pole replacements would occur in proximity to suitable aquatic habitats that can serve as dispersal corridors for amphibians and reptiles. Two seasonal watercourses flow through existing culverts beneath the proposed access road. PG&E would implement APM BIO-9, which requires a qualified biologist to relocate western pond turtles out of the way of construction, and MM Biology-3 to reduce impacts on amphibians by exclusion fencing.

As is the case for the existing project, use of the proposed access road could impede or discourage migratory birds nesting near construction sites. PG&E would implement MM Biology-5, which specifies seasonal work avoidance buffers for active nests.

Impacts would remain less than significant with mitigation.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? *No Impact***

As is the case for the existing project, use of the proposed access road will involve vegetation trimming within oak woodland/forest. However, the total area impacted is anticipated to remain within the amount and number approximated in the 2017 Final MND. PG&E would implement APM BIO-10, which ensures consistency with the Sonoma County Zoning Ordinance Article 67. The proposed modifications to the project would not alter the significance conclusions presented in the 2017 Final MND.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**  
***Less-than-Significant Impact With Mitigation***

The proposed access road is located within the boundary of PG&E's Bay Area Habitat Conservation Plan. PG&E would comply with applicable measures of this plan; thus, the proposed access road would not conflict with a habitat conservation plan.

**3.4.4 CONCLUSIONS**

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified impacts to biological resources. No new mitigation measures are required to ensure that impacts will remain less than significant.

**3.5 CULTURAL RESOURCE**

**3.5.1 DEFINITIONS**

This discussion adopts the definitions included in Section 3.5.1 of the 2017 Final MND (CPUC 2017: Final MND pages 3.5-1 to 3.5-3).

**3.5.2 ENVIRONMENTAL SETTING**

The "Environmental Setting" discussion in Section 3.5.2 of the 2017 Final MND described cultural and tribal resources in the project area and cultural and tribal resources with potential to be impacted by the approved project. This section also includes information about the regional setting, records search results, pedestrian survey summary, and Native American coordination (CPUC 2017: Final MND pages 3.5-4 to 3.5-12). That discussion is hereby incorporated by reference.

A cultural resources pedestrian inventory of the proposed existing access road was conducted on June 6, 2018 (Stantec 2018). The survey examined an Area of Direct Impact (ADI) that encompassed the length of the access road extending into Staging Area LZ-3 and included an assessment of subsurface disturbance to a depth of 5 inches.

Prefield research indicated that the area had been previously inventoried in 1985 (Origer) and 1986 (Stewart). One resource (P-49-000823; midden and lithic scatter) was identified approximately 100 feet south of the new access road ADI, and one resource (P-49-001395; sparse historic refuse scatter) is located within the access road ADI. Site testing consisting of several soil pits within 5 feet of the access road was conducted to determine the presence or absence of a subsurface artifact deposit associated with P-49-001395. Four of the test pits contained artifacts consisting of obsidian and chert fragments, historic brick fragments, and a piece of green glass.

**3.5.3 IMPACT ANALYSIS**

The "Impact Analysis" discussion in Section 3.5.3 of the 2017 Final MND analyzed impacts on cultural resources that would occur during construction, operation, and maintenance of the

proposed project (CPUC 2017: Final MND pages 3.5-12 to 3.5-17). That discussion is hereby incorporated by reference.

**a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? *Less-than-Significant Impact With Mitigation***

Stantec (2018b) determined that P-04-001395 is recommended ineligible to the California Register of Historic Resources for its lack of clear historical associations, paucity of archaeological information potential, and lack of depositional integrity. Since the proposed access road does not require additional ground disturbance, the resource will not be impacted by the project.

Because test excavations at the site focused on the archaeological deposits near the existing road to be used for project activities, PG&E crews and project equipment will remain in the established access road at all times and will implement APM CR-1 to avoid impacts to unknown cultural resources.

Use of the proposed access road will not result in additional impacts on historic resources beyond what was discussed in the 2017 Final MND and this impact would remain less than significant with mitigation.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? *Less-than-Significant Impact With Mitigation***

As discussed in significance criterion “a,” use of the proposed access road will not result in additional impacts on archeological resources. As with the approved project, impacts would remain less than significant with mitigation.

**c) Disturb any human remains, including those interred outside of formal cemeteries. *Less-than-Significant Impact***

The proposed access road will be used to enter and exit the construction staging area and no excavation work will occur. As with the approved project, this impact will remain less than significant.

**d) Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k)?, or
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence and with consideration of the significance of the resource to a California Native American tribe, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1? *Less-than-Significant Impact with Mitigation*

The proposed access road will be used to enter and exit the construction staging area and no excavation work will occur. PG&E would implement MM Cultural-2, which specifies requirements for cultural resources training. As with the approved project, impacts would remain less than significant with mitigation.

### **3.5.4 CONCLUSIONS**

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified impacts to cultural or tribal resources. No new mitigation measures are required to ensure that impacts will remain less than significant. No new information of substantial importance related to cultural or tribal resources has been identified, and none of the conditions described in Public Resource Code sections 15162 and 15163 that call for preparation of a subsequent negative declaration are present.

### **3.6 GEOLOGY, SOILS, AND MINERAL RESOURCES**

Section 3.6 of the 2017 Final MND described and analyzed impacts of the approved project related to geology, soils, and mineral resources (CPUC 2017: Final MND pages 3.6-1 to 3.6-18). That discussion is hereby incorporated by reference.

The proposed access road would not require any earthmoving activities and would not result in the loss of topsoil or increase erosion. The access road would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

### **3.7 GREENHOUSE GAS EMISSIONS**

Section 3.7 of the 2017 Final MND described and analyzed impacts of the approved project related to greenhouse gas (GHG) emissions relevant to the project (CPUC 2017: Final MND pages 3.7-1 to 3.7-2). That discussion is hereby incorporated by reference.

The proposed change in the location of the access road to Staging Area LZ-3 would not result in an increase in the level of equipment use or run time of equipment and would be consistent with the estimates provided in the Final MND. APM AIR-2 and APM GHG- 2 would ensure that any impacts from emissions would remain less than significant. The new access route would not result in a new impact or increase the severity of a previously analyzed impact on GHG emissions.

### **3.8 HAZARDS AND HAZARDOUS MATERIALS**

Section 3.8 of the 2017 Final MND described and analyzed impacts of the approved project related to hazardous materials and physical hazards in and around the project site (CPUC 2017: Final MND pages 3.8-1 to 3.8-12). That discussion is hereby incorporated by reference.

Hazardous materials (such as fuels and oils) may be transported across the proposed access route to the staging area and would be consistent with the types of materials analyzed in the 2017 Final MND. The proposed access road does not contain any known hazardous material sites. The route is bordered by non-native grassland, which could pose a fire risk; however, this risk is consistent with other work areas in the vicinity and throughout the project that are near or in grasslands. PG&E would implement the Fire Prevention Plan prepared for the project as well as additional fire safety practices to prevent wildland fires. APM HM-3, APM HM-4, MM Hazards-1, and MM Hazards-2 would ensure that impacts from hazards and hazardous materials continue to be less than significant with mitigation. The proposed access road would not result

in a new impact or increase the severity of a previously analyzed impact on hazards and hazardous materials.

### **3.9 HYDROLOGY AND WATER QUALITY**

Section 3.9 of the 2017 Final MND described and analyzed impacts of the approved project related to hydrology and water quality in and around the project site (CPUC 2017: Final MND pages 3.9-1 to 3.9-17). That discussion is hereby incorporated by reference.

The proposed access road crosses two water features that flow through existing culverts. Implementation of MM Hydrology-1 and MM Hydrology-2 would ensure that a Stormwater Pollution and Prevention Plan is prepared and implemented, and any impacts to water quality would remain less than significant with mitigation. The proposed road would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

### **3.10 LAND USE**

Section 3.10 of the 2017 Final MND described and analyzed impacts of the approved project related to land use in and around the project site (CPUC 2017: Final MND pages 3.10-1 to 3.10-11). That discussion is hereby incorporated by reference.

The proposed access road is located on private property and would not result in a new impact or increase the severity of a previously analyzed impact on land use and planning.

### **3.11 NOISE**

Section 3.11 of the 2017 Final MND described and analyzed impacts of the approved project related to noise in and around the project site (CPUC 2017: Final MND pages 3.11-1 to 3.11-19). That discussion is hereby incorporated by reference.

Activities associated with access road use area are the same as those discussed in the 2017 Final MND; this minor proposal simply shifts the location of any noise associated with use of the road to the revised access route. Although there are sensitive receptors within 500 feet of the new route, these sensitive receptors are located on Faught Road, an existing public road, and the noise levels will be the same as described in the Final MND. As with the existing route, PG&E will implement MM Noise-1 on the revised route and, thus, the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on noise.

### **3.12 PALEONTOLOGICAL RESOURCES**

Section 3.12 of the 2017 Final MND described and analyzed impacts of the approved project related to paleontological resources (CPUC 2017: Final MND pages 3.12-1 to 3.12-6). That discussion is hereby incorporated by reference.

No grading, new excavations, or digging would be performed along the access road. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on paleontological resources.

### **3.13 POPULATION AND HOUSING**

Section 3.13 of the 2017 Final MND described and analyzed impacts of the approved project related to population and housing in and around the project site (CPUC 2017: Final MND pages 3.13-1 to 3.13-3). That discussion is hereby incorporated by reference.

The proposed access road would not result in any impacts to population and housing and would be consistent with the analysis of the 2017 Final MND. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

### **3.14 RECREATION**

Section 3.14 of the 2017 Final MND described and analyzed impacts of the approved project related to recreation in and around the project site (CPUC 2017: Final MND pages 3.14-1 to 3.14-2). That discussion is hereby incorporated by reference.

The proposed access road is located on private land and would therefore have no impact on recreational facilities or parks. The proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

### **3.15 TRAFFIC AND TRANSPORTATION**

Section 3.15 of the 2017 Final MND described and analyzed impacts of the approved project related to traffic and transportation in and around the project site (CPUC 2017: Final MND pages 3.15-1 to 3.15-27). That discussion is hereby incorporated by reference.

The proposed access road would replace use on an approved access road to address community concerns related to the use of Shiloh Ridge Road. Use of the proposed access road would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic.

### **3.16 UTILITIES AND PUBLIC SERVICES**

Section 3.16 of the 2017 Final MND described and analyzed impacts of the approved project related to utilities and public services in and around the project site (CPUC 2017: Final MND pages 3.16-1 to 3.16-13). That discussion is hereby incorporated by reference.

The proposed access route would not include the construction of new, or expand existing, water facilities, stormwater drainage facilities, or require additional water entitlements or creation of new solid waste disposal needs.

### **3.17 MANDATORY FINDINGS OF SIGNIFICANCE**

#### **3.17.1 IMPACT ANALYSIS**

The “Impact Analysis” discussion in Section 3.17.1 of the 2017 Final MND addressed the mandatory findings of significance that would occur during construction, operation, and



maintenance of the proposed project (CPUC 2017: Final MND pages 3.17-1 to 3.17-32). That discussion is hereby incorporated by reference.

**Impact MFOS-1: Would the proposed project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? *No change***

Potential impacts to the environment, fish and wildlife habitat, fish and wildlife populations, plant and animal communities, endangered, rare, or threatened species, and examples of the major periods of California history or prehistory would be the same as the existing project. PG&E would implement the same APMs and MMs as for the existing project. The change in access routes would have no impact on these issues and impacts would remain less than significant with mitigation.

**Impact MFOS-2: Would the proposed project have impacts that are individually limited, but cumulatively considerable? “Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. *No change***

The cumulative project list in the 2017 Final MND remains current and applicable to the project area. The potential impacts from construction and operation of the proposed project modifications with regard to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, noise, paleontological resources, traffic and transportation, utilities, and public services would be similar to or reduced relative to the existing project. PG&E would implement the same APMs and MMs as for the existing project. As is the case for the existing project, impacts from construction and operation of the proposed modifications would not have a considerable contribution to a significant cumulative impact.

**Impact MFOS-3: Would the proposed project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? *No change***

As discussed in the sections above, construction and operation of the proposed project modifications would occur contiguous to the existing project study area and would not change the type or severity of impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, or utilities and service systems as the existing project analyzed in the 2017 Final MND. Impacts to air quality, water quality, and hazardous materials by the use of the proposed access road could directly affect human beings, and all CEQA impacts discussed above could indirectly affect human beings. However, implementation of APMs and MMs and compliance with applicable federal, state, and local regulations as discussed in the 2017 Final MND and in this Supp. PEA would reduce these impacts to a less-than-significant level. This Supp. PEA has identified no other direct or indirect adverse effects on human beings.

### **3.17.2 CONCLUSIONS**

The proposed modifications to the Fulton-Fitch Mountain Reconductoring Project would not result in new significant impacts or substantially increase the severity of previously identified

impacts on the environment. No new mitigation measures are required to ensure that impacts will remain less than significant. Therefore, no new information of substantial importance has been identified, and none of the conditions described in PRC Sections 15162 and 15163 that call for preparation of a subsequent negative declaration are present.

## 4.0 REFERENCES

- California Public Utilities Commission (CPUC). 2017. *Fulton-Fitch Mountain Reconductoring Project Final Initial Study/Mitigated Negative Declaration State Clearinghouse No. 2017072049*. Prepared by Panorama Environmental, San Francisco, California.
- Garcia and Associates (GANDA). 2018. *Addendum to March 2018 Bat Roosting Habitat Assessment for the Fulton-Fitch Mountain Reconductoring Project*. Unpublished report prepared for TRC Solutions, Mountain View, California. May 22, 2018.
- Stantec. 2018a. *Fulton-Fitch Mountain Reconductoring Project: Vegetation Survey at the New Access Road to Landing Zone 3*. Unpublished report prepared for Pacific Gas & Electric Company, San Francisco, California. May 4, 2018.
- \_\_\_\_\_. 2018b. *A Cultural Resources Pedestrian Inventory and Evaluation Report of 0.29 Acres for Pacific Gas & Electric Company's Proposed MPR-02 for the Fulton-Fitch Mountain Reconductoring Project*. Unpublished report prepared for Pacific Gas & Electric Company, San Francisco, California. August 1, 2018.